



State of Ohio Environmental Protection Agency

Northwest District Office

347 North Dunbridge Rd.
Bowling Green, OH 43402-9398

TELE: (419) 352-8461 FAX: (419) 352-8468
www.epa.ohio.gov

Ted Strickland, Governor
Lee Fisher, Lieutenant Governor
Chris Korleski, Director

Re: Warner Automotive
OHD981779374
Conditionally Exempt Small
Quantity Generator
Hancock County, NWDO
NOV

April 16, 2010

Mr. Bruce Herrig, Service Manager
Warner Automotive
1060 Bright Road
Findlay, Ohio 45840

Dear Mr. Herrig:

On April 7, 2010, Wendy Miller and I inspected Warner Automotive's Buick, Pontiac, GMC and Nissan dealership located at 1060 Bright Road in Findlay, Ohio. We inspected Warner Automotive to determine the facility's compliance with Ohio's hazardous waste laws as found in Chapter 3734. of the Ohio Revised Code (ORC) and Chapter 3745. of the Ohio Administrative Code (OAC). Our inspection included a tour of the facility service department and body shop as well as a review of facility records. We also helped Warner Automotive identify ways to prevent pollution by reducing waste the facility generates.

Warner Automotive is a full service automotive dealership which operates a service shop and auto body repair facility at the 1060 Bright Road location. Facility records reviewed during this inspection indicate that Warner Automotive generates approximately 20 gallons of (D001 ignitable) hazardous waste parts cleaning solvent in the service department once a year and approximately one (1) gallon per month of (D001 ignitable/ D035 methyl ethyl ketone/ F003 non halogenated solvent /F005 non halogenated solvent) spent paint gun cleaning solvent in the body shop. The spent paint gun cleaning solvent is distilled in the body shop and re-used. Approximately three (3) gallons of distillation bottoms are generated every six (6) weeks in the body shop which are managed as D001/D035/F003/F005 hazardous waste.

Mr. Bruce Herrig, Service Manager
Warner Automotive
April 16, 2010
Page 2

Warner Automotive also generates spent lead acid automotive batteries that are exchanged with new batteries by a battery wholesaler, used oil which is either burned on-site in the service department for heat or shipped off-site for recycling, used oil filters which are sent off-site for solid waste disposal, used anti-freeze/coolant which is sent off-site for recycling, used automotive tires which are sent off-site for shredding, and used paint filters and spent fluorescent light bulbs which are sent off-site for solid waste disposal.

We found the following violations of Ohio's hazardous waste laws during the inspection. In order to correct these violations you must do the following and send me the required information **within 30 days** of your receipt of this letter:

1. **OAC Rule 3745-52-11, Hazardous Waste Determination:** "Any person who generates a waste, as defined in rule 3745-51-02 of the Administrative Code, must determine if that waste is a hazardous waste..."
 - a. Warner Automotive has failed to evaluate the paint filters from the facility paint booth to determine if they are hazardous waste. Warner Automotive currently manages the spent paint filters as solid waste and disposes of the spent filters in a solid waste dumpster.

To abate this violation, Warner Automotive must analyze a representative sample of the spent paint filters for total volatile organic compounds (VOC's) and Resource Conservation and Recovery Act (RCRA) metals using methods as outlined in U.S. EPA's SW-846. This information should be submitted to my attention at the Ohio EPA within 30 days of receipt of this letter.

Warner Automotive should not dispose of any spent paint filters until analysis of the samples has been received.

- b. Warner Automotive has failed to evaluate the oily sludge discharged from the aqueous parts cleaning unit in the service department. The oily sludge is currently mixed with used oil and burned in the used oil heater located in the service department.

Mr. Bruce Herrig, Service Manager
Warner Automotive
April 16, 2010
Page 3

To abate this violation, Warner Automotive must analyze a representative sample of the oily sludge generated from the aqueous parts cleaner located in the service department for total volatile organic compounds (VOC's) and Resource Conservation and Recovery Act (RCRA) metals using methods as outlined in U.S. EPA's SW-846. This information should be submitted to my attention at the Ohio EPA within 30 days of receipt of this letter.

- c. Warner Automotive has failed to evaluate the spent fluorescent lamps used throughout the facility to determine if they are hazardous waste. Warner Automotive currently manages the spent lamps as solid waste and disposes of the spent lamps in a solid waste dumpster.

Warner Automotive must immediately cease disposing of the spent lamps as non-hazardous waste until a proper waste evaluation has been completed. The spent lamps typically contain mercury and other heavy metals which could make them a hazardous waste.

Warner Automotive has the option of handling spent lamps as hazardous waste or as universal waste. Managing hazardous waste lamps under the universal waste rules eases certain regulations imposed on generators of spent fluorescent lamps.

To abate this violation, Warner Automotive must choose one of the following options for the spent lamps:

i. Disposal Option:

Warner Automotive may manage the lamps as a hazardous waste. Warner Automotive must sample each type and brand of lamp used at the facility for RCRA metals using a Toxicity Characteristic Leaching Procedure (TCLP) test. Warner Automotive must ensure that all spent lamps that are determined to be hazardous waste are disposed of at a permitted hazardous waste disposal facility. Warner Automotive must submit all analytical results to Ohio EPA along with a description of how the spent lamps will be managed or,

ii. Recycling Option:

Mr. Bruce Herrig, Service Manager
Warner Automotive
April 16, 2010
Page 4

In lieu of evaluating and disposing of the spent lamps, Warner Automotive may manage spent lamps as universal waste. Universal waste spent lamps must be stored in a closed and labeled container. This container must be properly labeled with the wording "**Universal Waste Lamp(s)**", "**Waste Lamp(s)**", or "**Used Lamp(s)**". Warner Automotive must also track the accumulation of the spent lamps to ensure spent lamps are **not stored for greater than 365 days**. This can be accomplished with recycling receipts or by marking the container with the accumulation start date (the day the first spent lamp is placed in the container).

No spent lamps were in storage at the time of the inspection.

Ohio EPA recommends that spent lamps be managed as a universal waste and recycled. If Warner Automotive should choose the recycling option, you should submit to me the name of the recycling facility Warner Automotive intends to use.

To abate this violation, Warner Automotive must identify how the facility intends to properly manage the facility's spent lamps. This information should be submitted to my attention at the Ohio EPA within 30 days of receipt of this letter.

2. **OAC Rule 3745-279-22(C)(1), Marking of Used Oil Containers:** Containers and above ground tanks used to store used oil at generator facilities must be labeled or marked clearly with the words "Used Oil."

Warner Automotive failed to mark all containers used to accumulated used oil with the words, "Used Oil". Specifically, Warner Automotive uses one above ground tank, several 55 gallon containers and several portable totes to collect used oil from vehicles. These containers were not marked at the time of the inspection.

Warner Automotive labeled the above ground tank, the 55 gallon drums and the portable totes used to collect used oil with the words "used oil" during the inspection. Therefore, this violation has been abated.

Mr. Bruce Herrig, Service Manager
Warner Automotive
April 16, 2010
Page 5

As we discussed during the inspection, you may be able to reduce the waste your company generates. If you find ways to recycle, reduce or eliminate the amount of waste that your company generates you may be able to reduce treatment and disposal costs as well as regulatory requirements. During the inspection, I observed the following potential pollution prevention (P2) opportunities associated with your operations:

1. Facility records reviewed during the inspection indicate that Warner Automotive currently sends approximately 20 gallons of hazardous waste spent parts cleaning solvent off site each calendar year. Ohio EPA suggests that Warner Automotive pursue several pollution prevention opportunities to reduce or eliminate the amount of hazardous waste parts cleaning solvent that your facility generates. These opportunities include: using the same solvent used in your auto body repair facility and distilling the solvent in you distillation unit; substituting a non-hazardous high flash paint solvent, aqueous solvent or microbial solvent for the current solvent used; and/or entering into a continued use program for your spent parts cleaning solvent.
2. Facility records reviewed during the inspection indicate that Warner Automotive occasionally sends used oil off-site for recycling or fuels blending. Warner Automotive should consider the installation of an additional used oil burner at the facility to reduce the cost of sending the used oil-off site and to reduce the cost of heating your facility in the winter.
3. Facility records reviewed during the inspection indicate that Warner Automotive currently sends approximately 150 used oil filters off-site each month for disposal. Warner Automotive should consider recycling the used oil filters for the metal content.
4. We provided you with the following fact sheets during the inspection: Universal Waste Rules for Handlers of Lamps, dated June 2005; and Fluorescent Lamps: What You Should Know, dated January 2007. You were also provided a list of ; Lamp Recyclers in Ohio and Used Oil Filter Recyclers.

The Ohio Department of Development's Office of Energy Efficiency may be able to help with energy efficiency issues. Their website is at: <http://development.ohio.gov/cdd/oeef>.

Mr. Bruce Herrig, Service Manager
Warner Automotive
April 16, 2010
Page 6

If you would like a free, non-regulatory on-site pollution prevention assessment or if you would like more information about pollution prevention, please contact me at the number listed below. Ohio EPA has helpful information about this at the following web address: <http://epa.ohio.gov/ocapp>.

Enclosed you will find a copy of the checklists that we completed as a result of the inspection. Should you have any questions, please feel free to call me at (419-373-3056). You can find copies of the rules and other information on the division's web page at: <http://epa.ohio.gov/dhwm>.

Sincerely,



Gary S. Deutschman
Environmental Specialist III
Division of Hazardous Waste Management

//lr

pc: Brian Miller, Warner Automotive Body Shop Manager
Cindy Lohrbach, DHWM, NWDO
Colleen Weaver, Supervisor, DHWM, NWDO
DHWM, NWDO File-General File, Hancock County

ec: Gary Deutschman, DHWM, NWDO

Send to Central Office

**Ohio Environmental Protection Agency
RCRA SUBTITLE C SITE
IDENTIFICATION/VERIFICATION FORM**

For Ohio EPA use only

Completed verification forms required to be submitted to CO should be e-mailed to kristina.durnell@epa.state.oh.us.

Site EPA ID No. Site Name	EPA ID Number: OHD981779374		Website: warnerautomotive.com (Optional)						
	Name: Warner Automotive								
Site Location Information	Street Address: 1060 Bright Road								
	City, Town, or Village: Findlay		State: OH						
	County Name: Hancock		Zip Code: 45840						
Site Land Type (check only one) NAICS code(s) www.census.gov/epcd/www/naics.html	Private	County	District	Federal	Indian	Municipal	State	Other	
	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
Facility Representative Additional names can be recorded in number 12 Only provide address information if it is different than the site address	First Name: Bruce		MI:	Last Name: Herrig					
	Title: Service Manager								
	Phone Number: 419-429-6165			Phone Number Extension:					
	E-Mail Address: bherrig@warnerautomotive.com								
	Fax Number: 419-422-6149			Fax Number Extension:					
	Street or P.O. Box:								
	City, Town or Village:				Zip Code:				
Legal Owner And Operator of the Site. List Additional Owners and/or Operators in the Comment Section or on another copy of this form page	Name of Site's Legal Owner: Principle Holdings LLC				Date Became Owner (mm/dd/yyyy): 05/19/2005				
	Owner Type:	Private	County	District	Federal	Indian	Municipal	State	Other
		<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
	Street or P.O. Box: 1060 Bright Road								
	City, Town or Village: Findlay				Owner Phone #:				
	State: Oh				Country: USA		Zip Code: 45840		
	Name of Site's Operator:				Date Became Operator (mm/dd/yyyy):				
Operator Type:	Private	County	District	Federal	Indian	Municipal	State	Other	
	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
Street or P.O. Box:				Operator Phone #:					
City, Town or Village:				Country:		Zip Code:			
State:									

VIOLATIONS CITED? Yes No**TYPE OF HANDLER - MARK "X" AS APPROPRIATE**

<input type="checkbox"/> Not a HW Generator	<input type="checkbox"/> UNKNOWN: Cited for violation of 3745-52-11	<input type="checkbox"/> Large Quantity Generator (LQG)
	<input type="checkbox"/> Short-Term Generator (generates from a short-term or one-time event and not from on-going processes). Check the box for the applicable generator status and provide a comment.	<input type="checkbox"/> Small Quantity Generator (SQG)
		<input checked="" type="checkbox"/> Conditionally Exempt Small Quantity Generator
		<input type="checkbox"/> U.S. Importer of Hazardous Waste
		<input type="checkbox"/> Mixed Waste (Hazardous and Radioactive) Generator

TYPE OF REGULATED WASTE ACTIVITY (MARK "X" IN ALL OF THE APPROPRIATE BOXES)

- | | |
|---|--|
| <input type="checkbox"/> Hazardous Waste Transporter | <input type="checkbox"/> Exempt Boiler and/or Industrial Furnace |
| <input type="checkbox"/> Hazardous Waste Transfer Facility | <input type="checkbox"/> Small Quantity On-Site Burner Exemption |
| <input type="checkbox"/> Treater, Storer or Disposer of Hazardous Waste | <input type="checkbox"/> Smelting, Melting, Refining Furnace Exemption |
| <input type="checkbox"/> Recycler of Hazardous Waste | <input type="checkbox"/> Underground Injection Control Facility |
| | <input type="checkbox"/> Receives Hazardous Waste from Off-site |

UNIVERSAL WASTE ACTIVITIES (INDICATE TYPES OF UNIVERSAL WASTE MANAGED

(CHECK ALL BOXES THAT APPLY)

- | | |
|---|---|
| <input type="checkbox"/> Small Quantity Handler of Universal Waste | <input type="checkbox"/> Destination Facility for Universal Waste |
| <input type="checkbox"/> Large Quantity Handler of Universal Waste
(accumulates 5,000 kg. or more) | |

CHECK ALL BOXES BELOW THAT APPLY FOR THE TYPES OF UNIVERSAL WASTE THE FACILITY MANAGES

- Batteries
- Pesticides
- Mercury containing equipment
- Lamps

USED OIL ACTIVITIES (INDICATE TYPE(S) OF ACTIVITY(S))

- Used Oil Generator
- Used Oil Transporter
- Used Oil Transfer Facility
- Used Oil Processor
- Used Oil Re-refiner
- Off-Specification Used Oil Burner
- Used Oil Fuel Marketer Who Directs Shipment of Off-Spec. Oil
- Used Oil Fuel Marketer to Off-Specification Used Oil Burner

Waste Codes for Federally Regulated Hazardous Wastes: Please list the codes for the federally regulated hazardous waste handled at the site. List them in the order they are presented in the regulations (e.g., D001, D003, F007, U112). Use an additional page or list them in the comments if more space is needed. If the waste codes are the same as listed in the most recent RCRA info source record, you do not need to list them. Instead just indicate the date of the most recent source record.

D001 D035 F003 F005

COMMENTS: USE THIS AREA TO DESCRIBE WHETHER THE INSPECTION WAS ANNOUNCED, WHETHER THE WASTE IS STORED IN TANKS OR CONTAINERS, ETC.

Announced	<input type="checkbox"/> Yes	<input checked="" type="checkbox"/> No	Additional Facility Representatives: Brian Miller
Tanks	<input checked="" type="checkbox"/> Yes	<input type="checkbox"/> No	
Containers	<input checked="" type="checkbox"/> Yes	<input type="checkbox"/> No	

Name of Inspector(s)	Name of Inspector(s)	Date of Inspection/Time (mm/dd/yyyy) (hh:mm)
Gary Deutschman	Wendy Miller	04/7/2010

Comments:

Warner Automotive generates spent fluorescent lamps which the facility intends to manage as universal waste. Also, the ID# associated with this facility is 1060 County Road 95. This location is now known as 1060 Bright Road.

**CONDITIONALLY EXEMPT SMALL QUANTITY GENERATOR REQUIREMENTS
COMPLETE AND ATTACH A PROCESS, WASTE, P2 SUMMARY SHEET**

CESQG: ≤ 100Kg. (Approximately 25-30 gallons) of waste in a calendar month or < 1 Kg. of acutely hazardous waste.
 SQG: Between 100 and 1,000 Kg. (About 25 to under 300 gallons) of waste in a calendar month.
 LQG: ≥1,000 Kg. (~300 gallons) of waste in a calendar month or ≥1 Kg. of acutely hazardous waste in a calendar month.

NOTE: To convert from gallons to pounds: Amount in gallons x Specific Gravity x 8.345 = Amounts in pounds.

Safety Equipment Used:

WASTE EVALUATION

1.	Have all wastes generated at the facility been adequately evaluated? [3745-52-11]	Yes <input type="checkbox"/>	No <input checked="" type="checkbox"/>	N/A <input type="checkbox"/>
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GENERATOR CLASSIFICATION

2.	Does the generator produce <100 kg. of hazardous waste per month? [conditionally exempt small quantity generator ("CESQG")]	Yes <input checked="" type="checkbox"/>	No <input type="checkbox"/>	N/A <input type="checkbox"/>
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NOTE: If quantities of hazardous waste accumulated on-site at any one time exceed 1,000 Kg. - or the generator produces between 100 and 1,000 Kg. of hazardous waste per month, it is operating as a Small Quantity Generator ("SQG"). If so, complete the Small Quantity Generator Requirements checklist.

OFF-SITE SHIPMENT OF HAZARDOUS WASTE

3.	Does the CESQG ensure delivery of hazardous waste(s) to an off-site permitted TSD? [3734.02(F)]	Yes <input checked="" type="checkbox"/>	No <input type="checkbox"/>	N/A <input type="checkbox"/>
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TREATMENT OF HAZARDOUS WASTE

4.	Does the generator treat hazardous waste in a:			
	a. Container that meets 3745-66-70 to 3745-66-77?	Yes <input type="checkbox"/>	No <input type="checkbox"/>	N/A <input checked="" type="checkbox"/>
	b. Tank that meets 3745-66-90 to 3745-66-101 except 3745-66-97(C)?	Yes <input type="checkbox"/>	No <input type="checkbox"/>	N/A <input checked="" type="checkbox"/>
	c. Drip pads that meet 3745-69-40 to 3745-69-45?	Yes <input type="checkbox"/>	No <input type="checkbox"/>	N/A <input checked="" type="checkbox"/>
	d. Containment building that meets 3745-256-100 to 3745-256-102?	Yes <input type="checkbox"/>	No <input type="checkbox"/>	N/A <input checked="" type="checkbox"/>

NOTE: Complete appropriate checklist for each unit.

NOTE: If the CESQG conducts treatment they are subject to the LQG requirements.

NOTE: If waste is treated to meet LDRs, use LDR checklist.

OAC 3745-266-80 SPENT LEAD ACID BATTERIES BEING RECLAIMED

1.	Has the handler of reclaimed batteries notified Ohio EPA or US EPA of regulated waste activity?		Yes <input checked="" type="checkbox"/>	No <input type="checkbox"/>	N/A <input type="checkbox"/>
2.	Are the handler's batteries reclaimed through regeneration (such as by electrolyte replacement)?		Yes <input type="checkbox"/>	No <input checked="" type="checkbox"/>	N/A <input type="checkbox"/>
<i>NOTE: If yes, the handler is subject to OAC Chapter 3745-51 and OAC rule 3745-52-11</i>					
3.	Are the handler's batteries reclaimed other than through regeneration?		Yes <input checked="" type="checkbox"/>	No <input type="checkbox"/>	N/A <input type="checkbox"/>
	a.	If yes, does the handler:			
		i.	Generate, collect, and/or transport these batteries?	Yes <input checked="" type="checkbox"/>	No <input type="checkbox"/> N/A <input type="checkbox"/>
		ii.	Store these batteries but is not the reclaimer?	Yes <input checked="" type="checkbox"/>	No <input type="checkbox"/> N/A <input type="checkbox"/>
		iii.	Store these batteries before reclaiming them?	Yes <input type="checkbox"/>	No <input type="checkbox"/> N/A <input checked="" type="checkbox"/>
		iv.	Not store these batteries before reclaiming them?	Yes <input type="checkbox"/>	No <input type="checkbox"/> N/A <input checked="" type="checkbox"/>
<i>NOTE: If the answer to any question 3ai through 3aiv is yes, the handler is subject to OAC Chapters 3745-51 and 3745-270, and OAC rule 3745-52-11. If the handler stores batteries before reclaiming them, the handler is subject to permitting requirements (e.g., general or interim standard facilities). Complete other appropriate checklists (e.g., LDR, TSD).</i>					
4.	Has the handler adequately evaluated all waste generated at their facility?		Yes <input type="checkbox"/>	No <input checked="" type="checkbox"/>	N/A <input type="checkbox"/>

#4 – Paint Filters and Fluorescent Lamps not evaluated.

**USED OIL INSPECTION CHECKLIST
GENERATORS, COLLECTION CENTERS AND AGGREGATION POINTS**

NOTE: A facility is subject to the federal SPCC regulations (40 CFR 112) if it is non-transportation related (e.g., fixed) and has an aggregate above ground storage capacity greater than 1,320 gallons or a total underground storage capacity greater than 42,000 gallons of oil (including used oil), and there is reasonable expectation of a discharge to navigable waters.

PROHIBITIONS

1.	Does the generator manage used oil in a surface impoundment or waste pile? If yes:	Yes <input type="checkbox"/>	No <input checked="" type="checkbox"/>	N/A <input type="checkbox"/>
a.	Is the surface impoundment or waste pile regulated as a hazardous waste management unit? [3745-279-12(A)]	Yes <input type="checkbox"/>	No <input type="checkbox"/>	N/A <input checked="" type="checkbox"/>

NOTE: For example, used oil contaminated scrap metal stored in a pile.

2.	Is used oil used as a dust suppressant? [3745-279-12(B)]	Yes <input type="checkbox"/>	No <input checked="" type="checkbox"/>	N/A <input type="checkbox"/>
3.	Is off-specification used oil fuel burned for energy recovery in devices specified in 3745-279-12(C)?	Yes <input type="checkbox"/>	No <input type="checkbox"/>	N/A <input checked="" type="checkbox"/>

NOTE: Multiple used oil checklists may be applicable if used oil handler is performing multiple tasks (e.g., if generating used oil and shipping directly to a burner, complete generator and marketer checklists at a minimum).

GENERATOR STANDARDS

4.	Does the generator mix hazardous waste with used oil? If so,	Yes <input type="checkbox"/>	No <input checked="" type="checkbox"/>	N/A <input type="checkbox"/>
a.	Is the mixture managed as specified in 3745-279-10(B)? [3745-279-21(A)]	Yes <input type="checkbox"/>	No <input type="checkbox"/>	N/A <input checked="" type="checkbox"/>

NOTE: Used Oil mixed with listed (3745-51-30 to 3745-51-35) or characteristic (3745-51-20 to 3745-51-24) hazardous waste are subject to regulation as a hazardous waste, unless the listed hazardous waste is listed solely because it exhibits a hazardous characteristic, and the resultant mixtures do not exhibit a characteristic. Mixtures of used oil and CESQG hazardous waste are subject to OAC Chapter 3745-279.

5.	Does the generator of a used oil containing greater than 1,000 ppm total halogens manage the used oil as a hazardous waste unless the presumption is rebutted successfully? [3745-279-21(B)]	Yes <input type="checkbox"/>	No <input type="checkbox"/>	N/A <input checked="" type="checkbox"/>
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NOTE: If used oil contains greater than 1000 ppm total halogens, it is presumed to be listed hazardous waste until the presumption is successfully rebutted.

6.	Does the generator store used oil in tanks; or containers; or a unit(s) subject to regulation as a hazardous waste management unit? [3745-279-22(A)]	Yes <input checked="" type="checkbox"/>	No <input type="checkbox"/>	N/A <input type="checkbox"/>
7.	Are containers and aboveground tanks used to store used oil in good condition with no visible leaks? [3745-279-22(B)]	Yes <input checked="" type="checkbox"/>	No <input type="checkbox"/>	N/A <input type="checkbox"/>
8.	Are containers, above ground tanks, and fill pipes used for underground tanks clearly labeled or marked "Used Oil?" [3745-279-22(C)]	Yes <input type="checkbox"/>	No <input checked="" type="checkbox"/>	N/A <input type="checkbox"/>
9.	Has the generator, upon detection of a release of used oil, done the following: [3745-279-22(D)]	Yes <input type="checkbox"/>	No <input type="checkbox"/>	N/A <input checked="" type="checkbox"/>
a.	Stopped the release?	Yes <input type="checkbox"/>	No <input type="checkbox"/>	N/A <input checked="" type="checkbox"/>
b.	Contained the release?	Yes <input type="checkbox"/>	No <input type="checkbox"/>	N/A <input checked="" type="checkbox"/>
c.	Cleaned up and properly managed the used oil and other materials?	Yes <input type="checkbox"/>	No <input type="checkbox"/>	N/A <input checked="" type="checkbox"/>
d.	Repaired or replaced the containers or tanks prior to returning them to service, if necessary?	Yes <input type="checkbox"/>	No <input type="checkbox"/>	N/A <input checked="" type="checkbox"/>

ON-SITE BURNING IN SPACE HEATER

10.	Does the generator burn used oil in used-oil fired space heaters? [3745-279-23] If so:	Yes <input checked="" type="checkbox"/>	No <input type="checkbox"/>	N/A <input type="checkbox"/>
a.	Does the heater burn only used oil that owner/operator generates or used oil received from household do-it-yourself (DIY) used oil generators?	Yes <input checked="" type="checkbox"/>	No <input type="checkbox"/>	N/A <input type="checkbox"/>

b.	Is the heater designed to have a maximum capacity of not more than 0.5 million BTU per hour?	Yes <input checked="" type="checkbox"/>	No <input type="checkbox"/>	N/A <input type="checkbox"/>
c.	Are the combustion gases from heater vented to the ambient air?	Yes <input checked="" type="checkbox"/>	No <input type="checkbox"/>	N/A <input type="checkbox"/>

NOTE: Ash accumulated in a space heater must be managed in accordance with 3745-279-10(E).

GENERATOR TRANSPORTATION

11.	Does the generator have the used oil hauled only by transporters that have obtained a U.S. EPA ID#? [3745-279-24]	Yes <input checked="" type="checkbox"/>	No <input type="checkbox"/>	N/A <input type="checkbox"/>
12.	If the generator self-transport used oil to an approved collection site or to an aggregation point owned by the generator: [3745-279-24]			
a.	Does the generator transport used oil in a vehicle owned by the generator or an employee of the generator? [3745-279-24]	Yes <input type="checkbox"/>	No <input type="checkbox"/>	N/A <input checked="" type="checkbox"/>
b.	Does the generator transport more than 55 gallons of used oil at any time? [3745-279-24]	Yes <input type="checkbox"/>	No <input type="checkbox"/>	N/A <input checked="" type="checkbox"/>

NOTE: Used oil generators may arrange for used oil to be transported by a transporter without a U.S. EPA ID # if the used oil is reclaimed under a contractual agreement (i.e., tolling arrangement).

COLLECTION CENTERS AND AGGREGATION POINTS

13.	Is the DIY used oil collection center in compliance with the generator standards in 3745-279-20 to 3745-279-24? [3745-279-30]	Yes <input type="checkbox"/>	No <input type="checkbox"/>	N/A <input checked="" type="checkbox"/>
14.	Is the non-DIY used oil collection center registered with Ohio EPA? [3745-279-31]	Yes <input type="checkbox"/>	No <input type="checkbox"/>	N/A <input checked="" type="checkbox"/>
15.	Is the used oil aggregation point in compliance with the generator standards in 3745-279-20 to 3745-279-24? [3745-279-32]	Yes <input type="checkbox"/>	No <input type="checkbox"/>	N/A <input checked="" type="checkbox"/>

NOTE: Complete Used Oil Generator and any other applicable used oil handler checklist (e.g., marketer, burner, etc.) for used oil collection centers and aggregation points.

#8 – Used Oil Tank, Poly Drums and Portable Totes not labeled “Used Oil”. Marked “Used Oil” during inspection.

PROCESS, WASTE, P2 SUMMARY SHEET

Facility Name: Warner Automotive		Facility Type: CESQG		Date of Inspection: 4/7/10		EPA ID #: OHD981779374	
Waste Generated				On- or Off-Site Management		P2 Activities	
Process/Activity Generating Waste (e.g. plating bath, machining, baghouse, painting, general maintenance, etc)	Waste Description (e.g. sludge, solvent, ash, used oil, spent lamps, etc.) and EPA Waste Code, if applic.	QTY Generated per Month, Type of Accumulation (container, tank, etc) and location of waste accumulation area	Type of On-Site Treatment (recycle, wwt, etc)	Name, state, and type of activity occurring at the off-site facility.	Current P2 Activities	P2 Opportunities	
1	Parts Cleaning	D001 Spent Solvent	20 gallons/ year		Vesco Oil Corporation, 1900 E. Warren, Detroit Mi 48207	Distillation at Vesco	Solvent Substitution / Distillation
2	Steam Parts Cleaning	Oily Sludge	<1 gallon / month	Mixed w/ Used Oil & Burned in One On-site Used Oil Heating Unit		Used for Heating Value	
3	Battery Replacement	Spent Lead Acid Batteries	20 / month		Fort Meigs, 6610 Fairfield Drive, Suite D, Northwood, Ohio 43619	Shipped off-site for Recycling	
4	Oil Change	Used Oil	750 gallons / month	Burned in One On-site Used Oil Heating Unit	DISC Environmental Services, 151 East Andrus Road, Northwood, Ohio 43619	Used for Heating Value	Installation of Used Oil Burner in Body Shop

5	Oil Change	Used Filters	Oil	150 filters / month	Hot Drained	Solid Waste Disposal		Recycle metal content
6	Coolant Replacement	Used Anti-freeze		50 gallons / month		DISC Environmental Services, 151 East Andrus Road, Northwood, Ohio 43619	Recycled	
7	Lighting	Spent Fluorescent Light Bulbs		Varies		Solid Waste Disposal		Recycling
8	Air Conditioning Re-charge	Spent Freon		Varies	Captured and Re-generated on-site		Captured and Re-generated on-site	
9	Tire Replacement	Used Tires		40-50 / month		Enviro Tire, 2709 Bradeberry Road, Fostoria, Ohio (419)435-5611	Shredding	
	Paint Booth	Paint Filters		Monthly		Solid Waste Disposal		
11	Paint Gun Cleaning	D001/D035/F003/F005 Spent Solvent		2 Gallon / Every Other Month	Distillation		Distillation	Solvent Substitution,

12	Solvent Distillation	D001/D035/F003/F005 Spent Solvent Sludge	3 Gallons / Every 6 Weeks		Incineration, ChemTron, 35850 Schneider Court, Avon, Ohio 440-933-6348		
13	Cleaning	Contaminated rags	Varies	Laundered	City Laundry, Findlay, Ohio	Laundering	

REMARKS-GENERAL INFORMATION

General Process Information: Automotive Service and Auto Body Shop. Retailer of Buick, GMC and Nissan Trucks and Automobiles. Body Shop and Service Shop On-Site.

Regulatory/Enforcement History (if applicable):

Additional P2 remarks and information: Warner Automotive should consider switching to water based paints in the body shop, solvent substitution with non-hazardous solvent, installation of a second used oil heater to heat the body shop to reduced disposal cost and heating costs, recycling used oil filters for metal content and recycling of spent fluorescent lamps.

Would this facility be interested in a P2 assessment? Yes*___ No__X___

*If yes, refer promptly to your district P2 coordinator. Office of Compliance Assistance and Pollution Prevention – 1-800-329-7518 or p2mail@epa.state.oh.us or www.epa.ohio.gov/ocapp

Other: